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IN THE UNITED STATES DISTRICT COURT

DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ROBERT BUCKLEY HARDY,

Defendant.

Case No. 2:25cr 040 JNP

**MOTION FOR PROTECTIVE
ORDER**

Magistrate Judge Cecilia M. Romero

The United States of America, by and through Assistant United States Attorney, Carlos A. Esqueda, and by stipulation of counsel, and Robert Buckley Hardy, respectfully request that Court to enter the following protective order in this case:

1. The United States Attorney obtained an Indictment on February 12, 2025, that alleges the defendant committed a bank robbery. In the course of the United States' investigation, it has obtained statements and evidence from the alleged a victim and lay witnesses that contain personal information and identifiers, which should remain

confidential. The protective order only applies to the personal identifiers of the victim and lay witnesses. Counsel will receive unredacted discovery.

2. The United States intends to produce this material in discovery to the defense. All materials that the United States produces to the defense are solely for the use of the defendant, his respective attorneys, or other individuals or entities acting within the attorney-client relationship to prepare for the trial in this case. The purpose of this protective order is to prevent the unauthorized dissemination, distribution, or use of materials containing the personal information of others.

4. The Defendant and his attorneys, and all other individuals or entities who receive materials in this case are prohibited from directly or indirectly providing access to, or otherwise disclosing the contents of these materials to anyone not working on the defense of this criminal case, or otherwise making use of the materials in a manner unrelated to the defense of this criminal case. Authorized use of materials related to the defense of this criminal case shall include showing and discussing such materials with the United States and defense witnesses.

5. Defendant, his attorneys, and all other individuals or entities who receive materials in this case shall maintain all materials received from the United States in a manner consistent with the terms of this protective order. Materials produced to the defense shall be stored in a secure manner by defense counsel in boxes, files or folders marked "UNDER PROTECTIVE ORDER- DO NOT DISCLOSE." Electronic materials

produced to the defense and printouts obtained from electronic materials shall be handled in the same manner.


6. Defendant and his attorneys are required to give a copy of this protective order to all individuals or entities engaged or consulted by defense counsel in preparation of trial in this case. A knowing and willful violation of this protective order by the defendant, his attorney, or others may result in contempt of court proceeding or other civil or criminal sanctions.

7. The defendant, Robert Buckley Hardy, and counsel stipulate to the protective order. Counsel and defendant further agree that copies of the unredacted discovery relating to the identifiers of the victim and witnesses will not be provided to the defendant, nor will the defendant be allowed to make handwritten copies of the unredacted discovery related to the identifier information. However, redacted discovery may be provided to the defendant.

8. The provisions of this order governing disclosure and use of the documents shall not terminate at the conclusion of this criminal prosecution.

Dated this 25th day of February 2025..

TRINA A. HIGGINS
United States Attorney


/s/ Carlos A. Esqueda

CARLOS A. ESQUEDA
Assistant United States Attorney